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*Safeco Insurance Company Of America*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SAFECO INSURANCE COMPANY OF  
 AMERICA,

Plaintiff,

v.

JOHN JOSEPH-LOUIS JOHNSON, II, an  
 individual, and HONOUR LIGHT  
 INTERNATIONAL, INC.

Defendants.

CASE NO.: 2:23-cv-00743-JCM-NJK

**STIPULATION FOR EXTENSION OF  
 TIME FOR COUNTER-DEFENDANT  
 AND THIRD-PARTY DEFENDANT  
 RESPOND TO HONOUR LIGHT  
 INTERNATIONAL, INC.'S  
 COUNTERCLAIM**

**(First Request for Oneworld)**

**(Second Request for Safeco)**

Plaintiff/Counter-Defendant Safeco Insurance Company Of America (“Safeco”) and  
 Defendant/Counter-Plaintiff/Third-Party Plaintiff Honour Light International, Inc. (“HLI”), and  
 Third-Party Defendant Oneworld Insurance Agency Group, LLC (“Oneworld”) (collectively the  
 “Parties”) hereby submit this Stipulation to Extend the Time to Respond to HLI’s Counterclaim.

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1 On August 24, 2023, Safeco and HLI entered into a stipulation to extend the deadline for  
2 Safeco's response to HLI's counterclaim. (ECF No. 27). The purpose of the stipulation was to  
3 allow the parties in the underlying litigation to attempt to reach a settlement that would completely  
4 resolve the instant litigation. *Id.* Although the parties originally requested two (2) weeks, Safeco  
5 has been advised that settlement discussions are ongoing. Since that time, Oneworld was severed  
6 with the third-party complaint.

7 Safeco, HLI and Oneworld are in agreement that additional time should be granted to allow  
8 the parties in the underlying litigation to conclude their settlement discussions, which may include  
9 a settlement conference or private mediation. The parties assert that if a settlement is reached in  
10 the underlying litigation, the instant coverage litigation becomes moot and would no longer need  
11 to proceed. Good cause exists to grant this requested extension because it will facilitate continued  
12 efforts to resolve this litigation without the parties incurring unnecessary costs and/or going through  
13 the expense of litigation. It will also allow this case to be resolved without the need for judicial  
14 intervention. Excusable neglect is also present due to several factors. First, HLI, Safeco and  
15 Oneworld are reliant upon the information provided by the counsel representing the parties first-  
16 hand in the underlying litigation and are not directly involved in those settlement discussions and  
17 must wait until they are provided with updates on those discussions. Second, Oneworld has only  
18 just been able to retain counsel for this action and was therefore unable to meet and confer with the  
19 parties until this week. Third, counsel for Safeco was out of the office during the week of  
20 September 4<sup>th</sup> through September 8<sup>th</sup> due to continuing medical issues with a child. As such, the  
21 parties were unable to complete their meet and confer discussions until Tuesday,  
22 September 12, 2023. Upon completion of those discussions, the parties immediately prepared the  
23 instant stipulation for this Court's review and consideration.

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Therefore, the parties hereby request this Court grant an extension of time until Friday, October 13, 2023, for Safeco and Oneworld to file their responses to HLI's counterclaim/third-party complaint (ECF No. 20).

Dated: September 12, 2023

JESSE SBAIH & ASSOCIATES, LTD.

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*Oneworld Insurance Agency Group, LLC*

### ORDER

The above Stipulation **IS SO ORDERED.**

Dated: September 26, 2023

  
Nancy J. Koppe  
United States Magistrate Judge